-against- 100 CHURCH LLC, et al.,		100 CHURCH LLC OF AMENDED ANSWER TO MASTER COMPLAINT
	Plaintiff(s),	NOTICE OF ADOPTION BY
EDGAR ORELLANA,		07CV5398(AKH)
IN RE WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION		21MC102(AKH)
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	K	<u> </u>

PLEASE TAKE NOTICE that defendant 100 CHURCH LLC (hereinafter "100 Church"), as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts 100 Church's Amended Answer to Master Complaint dated August 30, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). 100 CHURCH has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

Defendants.

**PLEASE TAKE FURTHER NOTICE THAT** defendant, **100 CHURCH** reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 ( $\P$  D(1)-(5)).

**WHEREFORE**, 100 Church demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York December 4, 2007

## HARRIS BEACH PLLC

Attorneys for Defendant 100 CHURCH LLC

/s/

Stanley Goos, Esq. (SG 7062) 100 Wall Street, 23<sup>rd</sup> Floor New York, New York 10005 (212) 687-0100

TO:

Paul Napoli, Esq. Worby Groner Edelman & Napoli Bern LLP 115 Broadway, 12<sup>th</sup> Floor New York, New York 10006

Robert A. Grochow, Esq. Robert A. Grochow, P.C. 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

Gregory J. Cannata, Esq. Law Offices of Gregory J. Cannata 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279 *Liaison Counsel for Plaintiff* 

James E. Tyrrell, Esq. Joseph Hopkins, Esq. Patton Boggs LLP One Riverfront Plaza, 6<sup>th</sup> Floor Newark, New Jersey 07102

Thomas Egan, Esq.
Flemming Zulack Williamson Zauderer LLP
One Liberty Plaza
New York, New York 10006
Liaison Counsel for the Defendants

All Counsel via ECF

## **CERTIFICATION AS TO SERVICE**

The undersigned certifies that on December 4, 2007, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of 100 Church LLC's Adoption of Amended Answer to Master Complaint.

Dated: December 4, 2007

/s/ Stanley Goos, Esq. (SG 7062)